

have made significant investments and created a number of jobs in anticipation of supporting the rapid build-out and commercialization of C block network.

We believe that the Commission should have placed a greater emphasis on the comments made by our principal advocate within the Administration, the Small Business Association ("SBA"). According to the letter, "There are thousands of small business vendors, suppliers, contractors, engineering and marketing firms across the country who have not had the opportunity to finalize service contracts or commence work for C-block licensees."²

Small businesses and the jobs that we create are at the heart of the C block. While this proceeding is controversial, it is important to continue to focus on the contribution that we are all trying to make to facilities-based competition, at the same time that most of today's headlines are devoted to consolidation, rather than competition, among giant telecommunication companies.

We believe in auction integrity and fairness. However, in offering a set of options to C block licensees that is so limited as to be punitive, the commission inadvertently punished numerous suppliers and vendors who relied on C block licensees for new business. Commission policy should promote opportunities for all small business, including those engaged in supporting network build-out activities.

The Restructuring Order did not provide C block licensees with any commercially reasonable alternatives. We are concerned that the Order will result in even more bankruptcy filings by distressed C block licensees, which will delay further network build-out and, ultimately, a new competitor in the marketplace.

We urge you to reconsider the affect your decision has had on suppliers to the wireless marketplace. The C block experiment has not resulted in a significant amount of new facilities-based competition, as was anticipated. However, this public policy experiment can be a success if C block licensees are provided with commercially reasonable restructuring alternatives.

Respectfully Submitted,



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² See Jere W. Glover, Chief Counsel, U.S. Small Business Administration and Jenell S. Trigg, assistant Chief Counsel, telecommunications, to The Honorable Reed E. Hundt, Chairman, Federal Communications, *ex parte* letter, September 8, 1997 at p.5.